

1 Daniel Feinberg – SBN 135983
2 Cassie Springer-Sullivan – SBN 221506
2 Margaret E. Hasselman – SBN 228529
LEWIS, FEINBERG, LEE,
3 RENAKER & JACKSON, P.C.
1330 Broadway, Suite 1800
4 Oakland, CA 94612
Telephone: (510) 839-6824
5 Facsimile: (510) 839-7839
Email: dfeinberg@lewisfeinberg.com
6 Email: cssullivan@lewisfeinberg.com
Email: mhasselman@lewisfeinberg.com

7 *Attorneys for Plaintiff*

8 Bruce D. Celebreeze – SBN 102181
9 Dennis Rolstad – SBN 150006
Michelle Y. McIsaac – SBN 215294
10 SEDWICK, DETERT, MORAN
& ARNOLD LLP
11 One Market Plaza
Steuart Tower, 8th Floor
12 San Francisco, CA 94105
Telephone: (415) 781-7900
13 Facsimile: (415) 781-2635
Email: bruce.celebreeze@sdma.com
Email: dennis.rolstad@sdma.com
Email: michelle.mcissac@sdma.com

James M. Nelson – SBN 116442
SEYFARTH SHAW LLP
400 Capitol Mall, Suite 2350
Sacramento, CA 95814
Telephone: (916) 448-0159
Facsimile: (916) 558-4839
Email: jmnelson@seyfarth.com

14 *Attorneys for Defendants CNA Long Term
Disability Plan and Hartford Group Insurance
Company*

15 *Attorneys for Defendant CNA Short Term
Disability Plan*

16 IN THE UNITED STATES DISTRICT COURT
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA
18 OAKLAND DIVISION

19 DAVID CAPLAN,) Case No. C06-05865 CW
20 Plaintiff,)
21 vs.)
22 CNA SHORT TERM DISABILITY PLAN;)
CNA LONG TERM DISABILITY PLAN; and)
HARTFORD LIFE GROUP INSURANCE)
COMPANY,)
23 Defendants.)
24)
25)
26)
27)
28)

) **STIPULATION AND [PROPOSED]
ORDER TO EXTEND ADR
COMPLIANCE DATE**

STIPULATION AND [PROPOSED] ORDER TO EXTEND ADR COMPLIANCE DATE
CASE No. C06-05865 (CW)

1 WHEREAS Plaintiff has noticed a Motion to Modify Scheduling Order and Amend
2 Complaint for June 7, 2007; and

3 WHEREAS the proposed Second Amended Complaint would add two new defendants:
4 CNA Financial Corporation and University Disability Consortium, and would eliminate one
5 defendant: CNA Short Term Disability Plan; and

6 WHEREAS the Court ordered that the parties complete an ADR session by May 15,
7 2007; and

8 WHEREAS completion of an ADR session by May 15, 2007 would not enable the
9 potential new parties to participate if the Court permits Plaintiff to amend the complaint;

10 NOW, THEREFORE, the parties to this action, by and through their undersigned
11 attorneys, hereby stipulate and respectfully request the Court to order as follows:

12 1. The deadline to complete the court-ordered ADR session is extended from May
13 15, 2007, until either 45 days after the new Defendants appear or, if the Court
14 does not grant Plaintiff's Motion to Modify Scheduling Order and Amend
15 Complaint, 45 days after the Court denies Plaintiff's motion.

16
17 Dated: April 25, 2007

LEWIS, FEINBERG, LEE,
RENAKER & JACKSON P.C.

18 By: _____
19 Margaret E. Hasselman
20 Attorneys for Plaintiff

21 Dated: April 25, 2007

SEDGWICK, DETERT, MORAN
& ARNOLD LLP

22 By: _____
23 Michelle Y. McIsaac
24 Attorneys for Defendants CNA Long Term
Disability Plan and Hartford Group
25 Insurance Company

1 Dated: April 26, 2007

SEYFARTH SHAW LLP

2 By:

/s/

3 James M. Nelson

4 Attorneys for Defendant CNA Short Term
Disability Plan

5 PURSUANT TO STIPULATION, IT IS SO ORDERED.

6 Dated: 4/30, 2007

7 
Honorable Claudia Wilken
United States District Court